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Attorneys for Defendant City of Garden Grove

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

11 LUIS MEJIA,

12 Plaintiff,

13 v.

14 THE CITY OF GARDEN GROVE, and  
15 DOES 1 through 10, Inclusive,

16 Defendants.

NO. SACV06-1149 CJC(FFMx)

**PROTECTIVE ORDER  
REGARDING DISCLOSURE  
OF DOCUMENTS  
PRODUCED**

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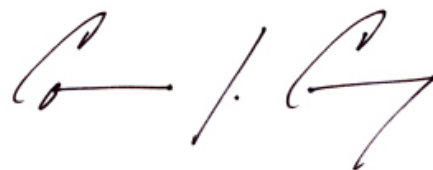
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**IT IS SO ORDERED:**



Date: March 17, 2008

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Hon. Cormac J. Carney  
United States District Judge

**Protective Order:**

1. Counsel for Defendants, City of Garden Grove and Officer Patrick Gildea, shall disclose to counsel for Plaintiff, records containing personnel information, including records of relevant citizen complaints, records of other arrests and incidences, and records of police procedures and training the police department deems confidential.

2. Counsel for the plaintiff shall not convey, transfer, publish, distribute, copy, duplicate or disseminate the information so provided except as may be reasonably necessary for the prosecution of this litigation, by communicating with plaintiff, or investigators, consultants and experts retained on behalf of the plaintiff in this matter.

3. Prior to the dissemination of any such information pursuant to this order, counsel for the plaintiff shall inform such person of the terms and conditions of this order and secure such person's agreement to be bound by it.

4. Plaintiff, plaintiff's counsel, and plaintiff's investigators, consultants and experts, are expressly prohibited from utilizing the disclosed information for any purpose other than the prosecution of *Luis Mejia, Plaintiff v. the City of Garden Grove, et al.*, and SACV06-1149 CJC(FFMx) and the information disclosed shall not be utilized in any other proceeding or litigation, or for any other purpose.

5. Plaintiff, plaintiff's counsel, and plaintiff's investigators, consultants and experts, are expressly prohibited from disclosing orally or otherwise the information subject to this Protective Order to any person other

than those who are reasonably necessary for the prosecution *Luis Mejia,*

1 *Plaintiff v. the City of Garden Grove, et al*, SACV06-1149 CJC(FFMx).

2 6. Plaintiff, plaintiff's counsel, and plaintiff's investigators,  
3 consultants and experts, are expressly prohibited from duplicating, copying or  
4 otherwise distributing or disseminating any of the disclosed information to any  
5 person or entity.

6 7. Counsel for each party shall take reasonable precaution to prevent  
7 the unauthorized or inadvertent disclosure of any of the protected information.  
8 Counsel shall take full and complete responsibility to ensure that any and all  
9 experts, consultants and investigators fully and completely comply with this  
10 Protective Order.

11 8. In the event anyone shall violate or threaten to violate any terms  
12 of this Protective Order, the aggrieved party may immediately apply to obtain  
13 relief to this court against any such person violating or threatening to violate  
14 any of the terms of this order. This court shall retain jurisdiction over the  
15 parties and any other persons subject to the terms of this order for the purpose  
16 of enforcing this order. The court shall have the power to impose whatever  
17 penalties it deems appropriate for the violation of said order, including, but not  
18 limited to, monetary and judicial sanctions and contempt.

19 9. At the final conclusion of this action, all disclosed materials will  
20 be returned to the counsel for the Defendants without request and within 30  
21 days of the final judgment, including any appeals, if any. Counsel for Plaintiff  
22 shall execute an affidavit of full compliance with this order and such original  
23 shall be turned over to the Defendants along with all items and materials  
24 referenced herein.

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1           10. This order shall survive the final termination of this action, to the  
2 extent that the information disclosed remains confidential and does not  
3 become known to the public, and the court shall retain jurisdiction to resolve  
4 any dispute concerning the use of the information disclosed herein.  
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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF ORANGE

I, Cathy Sherman, employed in the aforesaid County, State of California; I am over the age of 18 years and not a party to the within action. My business address is 1631 East 18th Street, Santa Ana, California 92705-7101.

On March 13, 2008, served the **[PROPOSED] PROTECTIVE ORDER REGARDING DISCLOSURE OF DOCUMENTS PRODUCED** on the interested parties in this action by placing a true copy thereof, enclosed in a sealed envelope, addressed as follows:

Elva P. Kopacz  
LAW OFFICE OF ELVA P. KOPACZ  
9042 Garfield Street, Suite 306  
Huntington Beach, CA 92646

XXX (By Mail) I placed such envelope for deposit in accordance with office practice, sealed, with postage thereon fully paid and the correspondence to be deposited in the United States mail at Santa Ana, California on the same day.

XXX (By e-filing) The above noted individuals are registered with the Court to receive notice of electronically filed documents. Per ECF rules, hard copies must be served only on parties who are not set up for electronic notification.

— (By Personal Service) I caused such envelope to be delivered by hand to the office of the addressee.

XXX (Federal) I declare under penalty of perjury that the foregoing is true and correct, and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on March 13, 2008, at Santa Ana, California.

/s/ Cathy Sherman  
Cathy Sherman